

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA**

SUSIE JORDAN, as Parent and
Guardian Ad Litem of A.E.J. (a
minor) and B.A.J. (a minor), and
SUSIE JORDAN, individually,
Plaintiffs,

Case No. 1:22-cv-12

**MOTION TO PROCEED
PRO HAC VICE WITHOUT
LOCAL COUNSEL**

v.

CHATHAM COUNTY SCHOOLS,
in its official capacity; DAN
BARNWELL; G. DOE (a minor); M.
DOE (a minor); GYM TEACHER
DOE A; GYM TEACHER DOE B;
DOES 1 through 20.

Defendants.

NOW COMES Plaintiffs, SUSIE JORDAN, individually and as
Parent and Guardian Ad Litem of A.E.J. (a minor) and B.A.J. (a minor),
inclusive, and hereby states as follows:

1. Plaintiffs filed their Complaint on January 10, 2022 (ECF 1).

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2. On February 4, 2022, it was ordered that Plaintiffs obtain counsel to represent them due to the nature of the Guardian Ad Litem status (ECF 6).

3. On May 16, 2022, the Court entered an Order allowing Plaintiffs an additional 60 days to retain local counsel and stating that if Plaintiffs are still unable to retain local counsel after the additional 60 day period, Plaintiffs' out-of-state counsel may enter appearance and file a Motion to Proceed Pro Hac Vice without Local Counsel (ECF 8).

4. Despite continued efforts, Plaintiffs have still been unable to obtain local counsel.

WHEREFORE, Plaintiffs respectfully request that the Court grant Plaintiffs' Motion to Proceed Pro Hac Vice without Local Counsel.

Dated: July 14, 2022

Respectfully Submitted,

/s/ Keith Altman

Keith Altman, Esq. (MI Bar No. P81702)

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CERTIFICATE OF SERVICE

I hereby certify that on July 14, 2022, I electronically filed the above document with the Clerk of the Court using CM/ECF, which will send electronic notification of such filing to all registered parties.

/s/ Keith Altman

Keith Altman

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